

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Creditor Num. Claims: 16543 and 28633

PROMESA
Title III

Case No. 17-BK-3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth, HTA and ERS**

**REPLY AND AMENDMENT REQUEST TO THE PROOF OF CLAIM OF THE
SEVENTY-NINTH OMNIBUS OBJECTION (NON_SUSTANTIVE) OF THE
COMMONWEATH OF PR, PR HIGHWAYS AND TRASPORTATION AUTHORITY
AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEATH OF PR TO DEFICIENT CLAIMS ASSERTING INTERESTS
BASED ON SALARY DEMANDS AND EMPLOYMENT OR SERVICES PROVIDED**

To the Honorable United States District Court Judge Laura Taylor Swain:

The debtors in these Title III cases included employees or former employees who have a claim against the Employees Retirement System (ERS), and the Commonwealth of Puerto Rico related to contributions to the systems, wages owed and labor benefits. Also, labor lawsuits can be included under the PROMESA Law.

In my case I have two (2) claims numbers 16643 against Employee Retirement System and Claim number 28633 against Commonwealth of Puerto Rico, that I have amendment request to included Civil Right Actions (Labor Discrimination Action Num. 3:15-CV-02571) for the total compensatory and punitive damages in excess of \$2,000,000.00.

I reply and objected to the eighty-sixth objection (the "Eighty-Sixth Omnibus Objection") to the proofs of claim listed on Exhibit A hereto, each of which failed to provide a basis for the asserted claim.

I provided and included with the reply on Exhibit A and B the basis supporting documentation for

asserting those claims.

JURISDICTION

1. The United States District Court for the District of Puerto Rico has subject matter jurisdiction to consider this matter and the relief requested herein pursuant to PROMESA section 306(a).

REPLY TO THE OBJECTIONS TO PROOFS OF CLAIM

1. I objected and I deny that I have Deficient Claims because they based on one or more statutes or laws passed by the Commonwealth, I provide basic information, such as the specific law number and year in which the statute was passed, what law the claimant asserts or how that law may have given rise to liabilities owed to the claimant by either the Commonwealth, HTA, ERS, or any other Title III debtor. what basis the claimant contends that the asserted laws give rise to any liabilities against either the Commonwealth, HTA, ERS, or any other Title III Debtor.

2. Claim Num. 16543 is about assert liabilities with the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, I included all individual contributions made to the retirement system during the period from 1995 until 2014. In addition to contributions that were not paid by government corporations during the period from some months 2010, November 2014 until August 2018. This money corresponds to the disbursement in full the amount is \$78,427.14. Law Num 3 -2013 as amended is applicable in this claim. Evidence of this debt is included in Exhibit A.

3. Claim Num. 28633 is about wages owed, benefits owed as a career employee of the commonwealth of Puerto Rico during the period November 2014 until October 2019. This is detailed in Exhibit B. The applicable Puerto Rico Labor Laws are 184-2004 as amended, 8-2017 as amended, 17-1931, as amended and Civil Code of Commonwealth of Puerto Rico. Amount owed is \$265,500.

Amendment request to the honorable court to include in the proof of claim 28633 the case

3:15-cv-92571 against the Commonwealth of Puerto Rico for damages, compensatory damages, punitive damages in excess of \$2,000,000.00. Complaint is included has part of Exhibit B.

4. **I do not received by mailing any of those orders** on August 13 or 19, 2019, the Court entered the *Order Granting in Part and Adjourning in Part Debtors' Motion for Entry of An Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Forms of Notice, (C) Approving Proposed Mailing, and (D) Granting Related Relief* [ECF No. 8453] (the "Authorized Mailings Order).

NOTICE CERTIFICATION

I certify that I provide notification of this reply by mail to the secretary of the court, to the Board of Supervision and the creditors committee at the addresses provided.

Respectfully Submitted.

Dated: November 20, 2019
San Juan, Puerto Rico

Creditor Num. 16543 and 28633

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